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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: Cathode Ray Tube (CRT)
ANTITRUST LITIGATION

This Document Relates To:

*Costco Wholesale Corporation v. Hitachi, Ltd.,
et al., No. 3:11-cv-06397-SC*

Master File No. 3:07-md-05944-SC

MDL No. 1917

**DECLARATION OF GEOFFREY
SHAVEY IN SUPPORT OF DIRECT
ACTION PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT BASED UPON
PLAINTIFFS' PURPORTED FAILURE
TO DISTINGUISH BETWEEN
ACTIONABLE AND NON-ACTIONABLE
DAMAGES UNDER THE FTAIA**

Judge: Hon. Samuel P. Conti
Court: Courtroom 1, 17th Floor
Date: February 6, 2015
Time: 10:00 a.m.

1
2 I, Geoffrey Shavey, hereby declare as follows:

3 1. I am currently the General Merchandise Manager for Apparel, Jewelry, and
4 Luggage at Costco Wholesale Corporation ("Costco"). I make this declaration based on my
5 personal knowledge.

6 2. From 1998 to the fall of 2006, I was a buyer in Costco's Consumer Electronic
7 Department. In that role, I was involved in Costco's purchase of consumer electronics for
8 Costco to sell to members in its warehouses in the United States, including televisions
9 containing cathode ray tubes ("CRTs").

10 3. In the fall of 2006, Costco promoted me to Assistant General Merchandise
11 Manager ("AGMM") for consumer electronics. My responsibilities in this position included
12 purchasing computers and computer-related products for resale in U.S. warehouses, such as
13 CRT monitors.

14 4. I have familiarity and experience with, and knowledge of, the process by which
15 Costco purchased CRT products, including the identity of the vendors from whom Costco
16 purchased CRT products and how those CRT products were received by Costco in the United
17 States during the Relevant Period of Q2 1995 through Q2 2006.

18 5. The transactional data produced by Costco in this litigation identifies the vendor
19 from whom Costco purchased CRT products and the location at which Costco received those
20 products. I understand that Costco's attorneys have instructed Costco's expert witnesses to
21 include in Costco's damages calculations only those CRT products that were received by
22 Costco in the United States (the "actionable purchases").

23 6. During the Relevant Period, Costco buyers for non-food items were based out of
24 Costco's Issaquah, Washington corporate office and were responsible for making the actionable
25 purchases. Purchase orders were issued either directly from Issaquah or from one of Costco's
26 regional offices in the United States.

27 7. During the Relevant Period, Costco made the actionable purchases exclusively
28 from vendors that I understand to have been located within the United States. Costco took

1
possession in the United States of all CRT products purchased from these vendors for resale in
2
U.S. warehouses..

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Executed this 18 day of December, 2014 at Issaquah, Washington

7
8 By:

Geoffrey Shavey